

CLEARY GOTTlieb STEEN & HAMILTON LLP

One Liberty Plaza
New York, NY 10006-1470

T: +1 212 225 2000

F: +1 212 225 3999

clearygottlieb.com

WASHINGTON, D.C. • PARIS • BRUSSELS • LONDON • MOSCOW
FRANKFURT • COLOGNE • ROME • MILAN • HONG KONG
BEIJING • BUENOS AIRES • SÃO PAULO • ABU DHABI • SEOUL

D: +1 212 225 2333
memcdonald@cgsh.com

STEVEN M. LOEB
CRAIG B. BROD
NICOLAS GRABAR
DAVID E. BRODSKY
RICHARD J. COOPER
JEFFREY S. LEWIS
PAUL J. SHIM
STEVEN L. WILNER
ANDRES DE LA CRUZ
DAVID C. LOPEZ
MICHAEL A. GERSTENZANG
LEV L. DASSIN
JORGE U. JUANTORENA
MICHAEL D. WEINBERGER
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DIANA L. WOLLMAN
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CARMINE D. BOCCUZZI, JR.
JEFFREY D. KARPF
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RAHUL MUKHI
ELANA S. BRONSON
MANUEL SILVA
KYLE A. HARRIS
LINA BENSMAN
ARON M. ZUCKERMAN
KENNETH S. BLAZEJEWSKI
MARK E. McDONALD
F. JAMAL FULTON
RESIDENT PARTNERS

SANDRA M. ROCKS
JUDITH KASSEL
PENELOPE L. CHRISTOPHOROU
BOAZ S. MORAG
MARY E. ALCOCK
HEIDE H. ILGENFRITZ
KATHLEEN M. EMBERGER
ANDREW WEAVER
HELENA K. GRANNIS
JOHN V. HARRISON
CAROLINE F. HAYDAY
NEIL R. MARKEL
LAURA BAGARELLA
JONATHAN D.W. GIFFORD
SUSANNA E. PARKER
DAVID W.S. YUDIN
RESIDENT COUNSEL

LOUISE M. PARENT
OF COUNSEL

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

May 20, 2021

Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC, et al.*, No. 20-cv-3773 (LGS):
Request to File Under Seal

Dear Judge Schofield:

We respectfully write on behalf of Plaintiff Manbro Energy Corporation ("Plaintiff"), in accordance with Paragraph I.D.3 of Your Honor's Individual Rules, to request leave to file under seal Plaintiff's response (the "Response") to Defendants' May 19 letter (ECF No. 64). Parties and attorneys of record who should have access to the sealed document are listed in Appendix A.

Plaintiff makes this sealing request pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020 (ECF No. 51) (the "Confidentiality Order"). Plaintiffs' Response references Confidential Information or Discovery Material, as defined in the Confidentiality Order, produced by Defendants in this case.

Pursuant to Paragraph I.D.3 of Your Honor's Individual Rules, Plaintiff notes that it has no interest in confidential treatment of the information contained in the Response and, therefore, absent objection by Defendants would propose to file the Response on the public docket without any redactions. Should Defendants object to public filing and/or propose redactions, Plaintiff will of course be guided by the Court.

Respectfully Submitted,

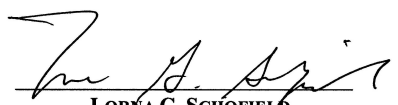
/s/ Mark E. McDonald

Mark E. McDonald

The application is GRANTED. Plaintiff's letter at Dkt. No. 67 and Defendant's proposed redactions at Dkt. No. 78 shall remain under seal with access restricted to the parties identified in the Appendix to this filing for the reasons identified in Defendant's letter at Dkt. No. 77. By **June 14, 2021**, Plaintiff shall file the letter at Dkt. No. 67 with the redactions proposed in Dkt. No. 78 on the public docket.

The Clerk of Court is respectfully directed to close the motion at Dkt. No. 66.

Dated: June 8, 2021 Cleary Gottlieb Steen & Hamilton LLP or an affiliated entity has an office in each of the cities listed below.
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Appendix A – Parties and Attorneys of Record

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Purnendu Chatterjee

Cleary Gottlieb Stein & Hamilton, LLP

Joon H. Kim

Victor L. Hou

Rahul Mukhi

Mark E. McDonald

Gibson, Dunn & Crutcher LLP

Randy M. Mastro

Mark A. Kirsch

Avi Weitzman

Casey Kyung-Se Lee